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Attorneys for Defendant
PetSmart, Inc.

**UNITED STATES DISTRICT COURT
FOR THE DISTRICT OF NEW JERSEY**

JACQUELYN REAVES,	:	Hon. _____
	:	Case No. _____
Plaintiff,	:	
	:	<i>Civil Action</i>
v.	:	
	:	LOCAL RULE 6.1 EXTENSION
PETSMART,	:	REQUEST
	:	
Defendant.	:	

APPLICATION

Defendant PetSmart, Inc. ("PetSmart") hereby applies pursuant to Local Civil Rule 6.1 for a Clerk's Order extending by 14 days the time within which it may answer, move or otherwise reply to the Complaint in this matter. In support of the instant application, PetSmart states as follows:

1. PetSmart has not requested nor obtained a previous extension.
2. PetSmart's counsel accepted service of the Complaint on behalf of PetSmart on March 2, 2016.
3. On March 30, 2016, PetSmart timely filed and served its notice of the removal of this action from New Jersey Superior Court, Somerset County, to the United States District Court for the District of New Jersey in accordance with 28 U.S.C. § 1446(b).

4. The time to answer, move or otherwise reply to the Complaint expires on April 6, 2016 (*i.e.*, 7 days after removal is filed in accordance with Rule 81(c)(2)(C) of the Federal Rules of Civil Procedure).

5. Accordingly, PetSmart now requests that this deadline be extended for an additional 14 days, up to and including April 20, 2016.

Respectfully submitted,

OGLETREE, DEAKINS, NASH,
SMOAK & STEWART, P.C.
Attorneys for Defendant
PetSmart, Inc.

By: s/ Jocelyn A. Merced
Jocelyn A. Merced, Esq.

Date: March 30, 2016

ORDER

The foregoing application is GRANTED and the time within which Defendant PetSmart may answer, move, or otherwise reply to the Complaint is extended for an additional 14 days, up to and including April 20, 2016.

William T. Walsh, Clerk

By: _____
Deputy Clerk

Dated:

24281890.1

CERTIFICATE OF SERVICE

I am an attorney licensed to practice before this Court and not a party to this action. I certify that, on this date, I caused a copy of the following document:

LOCAL RULE 6.1 EXTENSION REQUEST

to be served by FedEx overnight delivery to counsel for Plaintiff, at their last known address as follows:

Christian R. Oehm, Esq.
Lindgren, Lindgren, Oehm & You, LLP
246 Bridge Street, Bldg. G.
Metuchen, New Jersey 08840

I declare under penalty of perjury that the foregoing is true and correct.

Dated: March 30, 2016

s/Jocelyn A. Merced
Jocelyn A. Merced, Esq.

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